



November 10, 2004

Integrated Energy Policy Report Committee
California Energy Commission
Docket Unit, MS-4
1516 Ninth St.
Sacramento, CA 95814-5504

RE: Docket No. 04-IEP-01-November 15 workshop

Dear Integrated Energy Policy Report Committee,

Heal the Bay (HtB) is a non-profit environmental organization with over 10,000 members dedicated to making the waters of Southern California clean and healthy for marine life and people. The Santa Monica Baykeeper (SMBK) is a non-profit organization dedicated to the preservation and restoration of Santa Monica Bay, San Pedro Bay, and adjacent coastal waters. The Baykeeper has approximately 2,000 members, most of whom reside in Los Angeles County. The Baykeeper's mission includes the monitoring and protection of the region's waters, including local watersheds, marine sanctuaries, rivers, coastal estuaries, wetlands and bays from illegal dumping, hazardous spills, toxic sources and other pollution, including polluted runoff. HtB and the SMBK have reviewed staff's proposed scope of work for the Environmental Performance Report and respectfully submit the following comments.

HtB and SMBK are highly supportive of the work of the committee to thoroughly review the environmental impacts associated with energy production in the State. A comprehensive review of this nature is critical to address both the individual and cumulative impacts of power generation facilities, particularly those that utilize once-through cooling. Coastal power plants that utilize once-through cooling are a major source of aquatic mortality in our State waters. Recognizing the potentially devastating impact of these systems on the marine environment, the U.S. EPA has prohibited the use of once-through cooling on all new power generation facilities and has mandated significant reductions in impingement-related impacts by 80-95% and entrainment-related impacts by 60-90% for existing facilities.

We are supportive of Staff Questions and Proposed Issue Areas and feel that they will address a wide array of environmental issues related to California's power generation and transmission systems. In attachment C, we recommend that regularly collected impingement data be included as a data request. In addition, we recommend that regular updates pertaining to co-located desalination facilities (planning, pilot, or full scale implementation) be included as well.

We have compiled a list of specific issues related to once-through cooling that we would like to see addressed by the Report:

1. **Cumulative Impacts** - What are the local and regional impacts to the marine environment from the numerous coastal facilities that utilize once-through cooling?
2. **Existing Data** - What is known about the impacts of once-through cooling, and what additional data must be collected to quantitatively evaluate all potential impacts to marine life?
3. **Enclosed Bays and Estuaries** - Due to the recognized problems with many of our fisheries and the critical importance of enclosed bays and estuaries as nursery and adult habitats, we recommend that all intakes be prohibited in enclosed bays and estuaries by 2015.
4. **Repowering** - What steps can be taken to ensure that the repowering of existing facilities does not further promote the use of once-through cooling? What are the most effective and efficient cooling options and what role is there for wastewater in cooling systems?
5. **Renewable Energy** - What is the trend in the integration of renewable and environmentally-sound sources of energy production? What studies have been completed or are planned to evaluate the potential impacts of renewable energy, how these impacts can be minimized, and how to further accelerate implementation of renewable energy into the State's energy portfolio?
6. **Desalination** - How might the numerous proposed co-located desalination facilities throughout the state perpetuate the use of once-through cooling? Co-located desalination facilities must not be used as a tool to extend the life of existing facilities, facilitate the re-powering of facilities that utilize once-through cooling, or as a tool to promote variances in reductions of impingement and entrainment as mandated by the new 316(b) regulations.
7. **New 316(b) Regulations** – What changes are being required of existing facilities as a result of the new 316(b) regulations? What new studies are being conducted and what are the results of the studies? What, if any, requirements have been made of facilities to alter their intake systems and/or operational systems? What, if any, new mitigation has been required and what is the nature of such mitigation?

We would like to thank the Committee for the opportunity to comment on the proposed Report. It is time for California to truly take a lead role and set a model for the rest of the world on energy conservation, production, and distribution.

Please contact us if you have any questions or would like additional information.

Thank you,

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